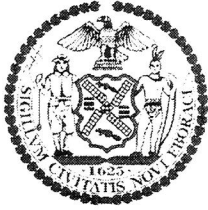


EXHIBIT D



Eric Gonzalez
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March 12, 2021

VIA REGULAR MAIL

Mirel Fisch, Esq.
The Law Offices of Anthony M. Grandinette
114 Old Country Road, Suite 420
Mineola, NY 11501

Re: O'Hara v. City of New York, et al.
E.D.N.Y. docket no. 17-cv-4766
REVISED RESPONSE TO SUBPOENA

Dear Ms. Fisch,

Please accept this correspondence, and attached records, as the Kings County District Attorney's revised response to your subpoena. Fifty (50) additional pages have been produced. The Bates numbers are consistent with the prior productions.

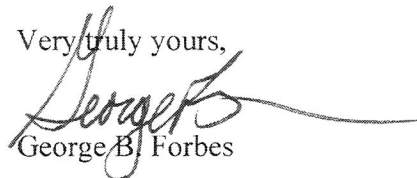
Records responsive to your request are have been produced, with the following exceptions:

Kings County District Attorney's Office
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)
Page 2 of 2

REVISED PRIVILEGE LOG

Bates No.	Date	Author	Recipient	Privileges	Description
1046 – 1048	Feb. 2, 2015	James M. Bernard, Esq.	Kenneth P. Thompson, Esq.	Attorney-Client privilege	Retainer agreement that contains therein a confidential communication of legal advice.
1141 – 1161	June 10, 2016	Jerry H. Goldfeder, Esq.	Mark Hale, Esq.	Attorney-Client privilege; Attorney-Work Product privilege	Memorandum of law from attorney to client analyzing purported election law violations in People v. O'Hara, Kings Co. Ind. No. 13525/96.
1162 - 1189	Unknown	Mark Hale, Esq.	Eric Gonzalez, Esq.	Attorney-Work Product privilege; CPL § 160.55; CPL § 190.25	Memo has been produced in redacted form. Final memorandum with legal analysis and recommendations from head of Conviction Review Unit to Kings County District Attorney.

Very truly yours,


George B. Forbes

GBF/